

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)	
)	
MELINDA K. POIGNEE,)	Case Number: 20-42938-399
)	
Debtor.)	Chapter 7
)	
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TRACY A. BROWN, TRUSTEE,)	Response to Objection to
)	Exemptions
Movant,)	Filed by Debtor
)	
vs.)	Jack J. Adams #37791MO #37791
)	Adams Law Group
MELINDA K. POIGNEE,)	1 Mid Rivers Mall Drive, Suite 200
)	St. Peters, Missouri 63376
Respondent.)	(636) 379-4744 / Fax (636) 379-3978
)	
)	Regarding Document Number: 17
)	

RESPONSE TO OBJECTION TO EXEMPTIONS
FILED BY TRACY A. BROWN, TRUSTEE

COMES NOW Debtor Melinda K. Poignee, by and through his undersigned counsel, and for her Response to the Objection to Exemptions (the "Objection") filed by Tracy A. Brown, Trustee, states to the Court as follows:

1. Debtor admits the allegations contained in Paragraph 1 of the Objection.
2. Debtor admits the allegations contained in Paragraph 2 of the Objection.
3. Debtor admits the allegations contained in Paragraph 3 of the Objection.
4. Debtor admits the allegations contained in Paragraph 4 of the Objection.
5. Debtor admits the allegations contained in Paragraph 5 of the Objection.
6. Debtor admits the allegations contained in Paragraph 6 of the Objection.
7. Debtor admits the allegations contained in Paragraph 7 of the Objection.

8. Debtor denies the allegations contained in Paragraph 8 of the Objection only to state that tenancy by the entireties property may be reached by the trustee to the extent necessary to pay joint unsecured debts.

9. Debtor denies the allegations contained in Paragraph 9 of the Objection only to state that the assets claimed as exempt by Debtor under Section 522(b)(3)(B) are tenancy by entireties properties which are not exempt from joint unsecured debts.

10. Paragraph 10 of the Objection states requests instead of allegations, to which no response is required. To the extent that a response is required, Debtor is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10 of the Objection, and therefore, denies the same.

WHEREFORE, Debtor Melinda K. Poignee prays this Honorable Court make and enter its order denying the Objection to Exemption filed by Tracy A. Brown, Trustee; granting the Trustee's Objection to Debtor's Claim of Tenancy by Entirety Exemption to the extent of any and all joint unsecured debt; and for such other and further relief as the Court deems just and proper.

Respectfully submitted,
ADAMS LAW GROUP

/s/ Bryan T. Voss

JACK J. ADAMS #37791MO #37791
BRYAN T. VOSS #48029MO #48029
Attorney for the Debtor
1 Mid Rivers Mall Drive, Ste. 200
St. Peters, Missouri 63376
(636) 397-4744 / Fax (636) 397-3978
contact@thinkadamslaw.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on September 4, 2020 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed below on September 4, 2020:

Michael J. Poignee
23 Ellis Ave.
Troy, MO 63379

/s/ Ryan J. Brown
Ryan J. Brown